



Proposed Standards for Rangeland Health and Guidelines for Livestock Grazing Management

Developed by BLM Idaho's Resource Advisory Councils



March 1997

Dear Reader,

I am pleased to present you with proposed *Standards for Rangeland Health and Guidelines for Livestock Grazing Management* developed by the Bureau of Land Management's (BLM) three Resource Advisory Councils in Idaho. The 45 citizens who developed these proposed standards and guidelines, which will apply to nearly 12 million acres of public land the BLM administers in the Gem State when they are finalized, represent a wide variety of interests — ranchers, conservationists, elected officials, recreationists, business owners, Native Americans, miners, archaeologists, county government employees, and university professors. I am very proud that so many individuals with such diverse backgrounds and values were able to work together to develop the resource measures and guidance needed to maintain, or make significant progress toward, healthy, functional rangelands in Idaho.

The proposed standards and guidelines will be available for your review until May 16, 1997. I hope you will take advantage of the opportunity to take a look at them and let us know what you think. I assure you that we will carefully review and consider each and every comment we receive. If you have any questions, or need any additional information, please do not hesitate to contact one of our Resource Advisory Council members or the nearest BLM office.

Sincerely,

s/*Martha Hahn*

BLM Idaho State Director



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BLM Idaho Resource Advisory Council Members

The proposed *Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management* were developed by the 45 members of the Bureau of Land Management's three Resource Advisory Councils in Idaho.

If you would like to discuss the proposed standards and guidelines with one of the Resource Advisory Council members, please call the appropriate Resource Advisory Council coordinator and they will arrange it.

LOWER SNAKE RIVER DISTRICT RESOURCE ADVISORY COUNCIL

Resource Advisory Council Coordinator: Barry Rose (208) 384-3393

Robert Amidor Boise, Idaho	Agnes Brailsford Hagerman, Idaho	Pam Marcum Boise, Idaho	Grant Simonds Boise, Idaho
Cindy Bachman Bruneau, Idaho	Ric Branch Midvale, Idaho	David Meyers Boise, Idaho	Don Weilmunster Garden Valley, Idaho
Mary Barraco Caldwell, Idaho	Terry Gibson Owyhee, Nevada	Mike Misner Boise, Idaho	Robert Yohe II Boise, Idaho
Bert Brackett II Rogerson, Idaho	Lahsha Johnston Boise, Idaho	William Platts Boise, Idaho	

UPPER SNAKE RIVER DISTRICTS RESOURCE ADVISORY COUNCIL

Resource Advisory Council Coordinator: Debra Kovar (208) 886-7201

Jay Anderson Pocatello, Idaho	Fred Brossy Shoshone, Idaho	Kent Just Twin Falls, Idaho	Virginia Rickettes Jerome, Idaho
Dave Clark Ashton, Idaho	Clark Collins Pocatello, Idaho	Linn Kincannon Sun Valley, Idaho	Rob Van Kirk Island Park, Idaho
William Bachman Boise, Idaho	Dave Farnworth Soda Springs, Idaho	Roy Prescott Jerome, Idaho	Diane Yupe Fort Hall, Idaho
Tom Blanchard Bellevue, Idaho	Peter Janss Bliss, Idaho	LeRoy Reed Idaho Falls, Idaho	

UPPER COLUMBIA - SALMON CLEARWATER DISTRICTS RESOURCE ADVISORY COUNCIL

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Michael Bowman Moscow, Idaho	Larry Drew Rathdrum, Idaho	Robert Recht Murray, Idaho	James Whittaker Leadore, Idaho
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Putting Standards and Guidelines in Place

In August 1996, the BLM and the three Resource Advisory Councils in Idaho determined that the best way to put *Standards for Rangeland Health and Guidelines for Livestock Grazing Management* into place in Idaho was to incorporate them into the Upper Columbia River Basin Environmental Impact Statement (UCRB EIS).

However, delays in the release of the draft UCRB EIS have precluded the BLM from putting standards and guidelines in place in Idaho through that process in a timely fashion. In January 1997, the BLM and the Resource Advisory Councils, decided to initiate a different process to put standards and guidelines in place in Idaho. That process is as follows:

- The proposed standards and guidelines developed by the Resource Advisory Councils are presented to the public in this booklet. Individuals and organizations will have 60 days, until May 16, 1997, to study the standards and guidelines and provide their impressions of them to the BLM and the Resource Advisory Councils.

- Written remarks should be sent to *J. David Brunner*, BLM Idaho State Office, 1387 S. Vinnell Way, Boise, Idaho. They must be postmarked no later than May 16, 1997. For information on how to increase the effectiveness of written suggestions, see page #17.

- The BLM does not plan to hold any public meetings on the proposed Idaho standards and guidelines. However, BLM staff and Resource Advisory Council members are available to make presentations to organizations and

provide information to individuals. Organizations and individuals who would like to discuss proposed Idaho standards and guidelines with one of the Resource Advisory Council members who developed them should contact the appropriate Resource Advisory Council Coordinator, listed on page #1. Organizations and individuals who would like to discuss proposed Idaho standards and guidelines with a BLM staff member should contact the nearest BLM office (see page #19).

- In late May, the BLM and the Resource Advisory Councils will review all written remarks received and make any appropriate changes in the proposed standards and guidelines.

- In early June, the BLM will conduct a final review of all approved land use plans and other environmental documents in Idaho to determine if the proposed standards and guidelines are consistent with them or whether further analysis is needed.

- In late June, the BLM will begin any further analysis that may be needed to put the standards and guidelines in place in Idaho.

- Once all of the necessary work is completed, the BLM will submit Idaho standards and guidelines to the Secretary of the Interior for approval. The final standards and guidelines will be distributed to all individuals and organizations on the BLM's standards and guidelines mailing list.

Since the public review process for proposed Idaho standards and guidelines will occur before the UCRB EIS is completed, the application of standards and guidelines will be limited to actions related to livestock grazing management. The application of standards to other public range-land uses will still be accomplished through the UCRB EIS process. To be added to the UCRB EIS mailing list, call the UCRB EIS team at (208) 334-1770, extension 137 or write them at 304 North 8th Street, Room 250, Boise, Idaho 83706.

The BLM's grazing regulations that went into effect in August 1995 required each state to either develop their own standards and guidelines or implement national fallback standards and guidelines by February 12, 1997. However, the Secretary of the Interior has extended that deadline for BLM Idaho until August 12, 1997. If, for some reason, it is not possible to complete the appropriate environmental review of proposed Idaho standards and guidelines by August 12, the fallback standards and guidelines, which are described in Part 43 Code of Federal Regulations 4180.2(f)(1) and (2), will be put into effect until Idaho standards and guidelines are completed and approved by the Secretary of the Interior.



Proposed Idaho Standards for Rangeland Health

INTRODUCTION

The Standards for rangeland health, as applied in the State of Idaho, are to be used as BLM's management goals for the betterment of the environment, protection of cultural resources, and sustained productivity of the range. They are developed with the specific intent of allowing for the multiple use of the public lands. Application of the standards should involve collaboration between the authorized officer, interested publics, and resource users.

Rangelands should be in a properly functioning condition or making significant progress toward meeting the standards for rangeland health. Monitoring of all uses is necessary and the primary tool for determining rangeland condition and trend. It will be performed on representative sites.

Appropriate to soil type, climate, and landform, indicators are a list of typical physical and biological factors and processes that can be measured or observed. They are used in combination to provide information necessary to determine the health and condition of rangelands. No single indicator provides sufficient information to determine rangeland health. Only those indicators appropriate to a particular site are to be used. The indicators listed below each standard are not intended to be all inclusive.

The issue of scale must be kept in mind in evaluating the indicators listed after each standard. It is recognized that individual isolated sites within a landscape may not be meeting the standards, however, broader areas must be in proper functioning condition. Furthermore, rangeland fragmentation which reduces the effective size of large areas must also be evaluated for its consequences.

STANDARD 1 (WATERSHEDS)

Watersheds provide for natural infiltration, retention and release of water appropriate to soil type, vegetation, climate and landform.

Indicators may include but are not limited to the following:

(1) The amount and distribution of ground cover, including litter, for identified ecological site(s) or soil-plant associations is appropriate for site stability.

(2) Evidence of accelerated erosion in the form of rills and/or gullies, erosional pedestals, flow patterns, physical soil crusts/surface sealing and compaction layers below the soil surface is minimal for soil type and landform.

STANDARD 2 (RIPARIAN AREAS AND WETLANDS)

Riparian-wetland areas are in properly functioning condition appropriate to soil type, climate, geology, and landform.

Indicators may include but are not limited to the following:

(1) The riparian/wetland vegetation is controlling erosion, stabilizing streambanks, shading water areas to reduce water temperature, stabilizing shorelines, filtering sediment, aiding in floodplain development, dissipating energy, delaying flood water, and increasing recharge of groundwater appropriate to site potential.

(2) Riparian/wetland vegetation with deep strong binding roots is sufficient to stabilize streambanks and shorelines. Invader and shallow rooted species are a minor component of the floodplain.

(3) Age class and structural diversity of riparian/wetland vegetation is appropriate for the site.

STANDARD 3 (STREAM CHANNEL/FLOODPLAIN)

Stream channels and floodplains are properly functioning relative to the geomorphology (e.g. gradient, size, shape, roughness, confinement, and sinuosity) and climate.

Indicators may include but are not limited to the following:

(1) Stream channels and floodplains dissipate energy of high water flows and transport sediment. Soils support appropriate riparian-wetland species, allowing water movement, sediment filtration, and water storage. Stream channels are not entrenching.

(2) Stream width/depth ratio, gradient, sinuosity, and pool, riffle and run frequency are appropriate for the valley bottom type, geology, hydrology and soils.

(3) Streams have access to their floodplains and sediment deposition is evident.

(4) There is little evidence of excessive soil compaction due to human activities.

(5) Streambanks are within an appropriate range of stability according to site potential.

STANDARD 4 (NATIVE PLANT COMMUNITIES)

Healthy, productive and diverse populations of native plants are maintained or promoted as appropriate to soil type, climate and landform.

Indicators may include but are not limited to the following:

(1) Native plant communities (flora and microbiotic crusts) are maintained or improved to ensure the proper functioning of ecological processes and continued productivity and diversity of native plant species. Where native communities exist, the conversion to exotic communities after disturbance will be minimized.

(2) The number of native species is maintained.

(3) Plant vigor (production, seed and seedstalk production, cover, etc.) is adequate to enable reproduction and recruitment of plants when favorable climatic events occur.

(4) Noxious weeds are not increasing.

(5) Adequate organic matter (litter and standing dead plant material) is present for site protection and for decomposition to replenish soil nutrients relative to site potential.

STANDARD 5 (SEEDINGS)

Rangelands seeded with mixtures including predominately nonnative plants are functioning to maintain lifeform diversity, production, nutrient cycling, energy flow, and the hydrologic cycle.

Indicators may include but are not limited to the following:

- (1) In established seedings, the number of perennial species is not diminished over time.
- (2) Plant production, seed production, and cover are adequate to enable recruitment when favorable climatic events occur.
- (3) Noxious weeds are not increasing.
- (4) Adequate organic matter (litter and standing dead plant material) is present for site protection and for decomposition to replenish soil nutrients relative to site potential.

STANDARD 6 (UNDESIRABLE EXOTIC PLANT COMMUNITIES)

Until feasible cost effective rehabilitation treatments are developed, communities of undesirable exotic plants will meet minimum requirements of soil stability and maintenance of existing native and seeded plants.

Indicators may include but are not limited to the following:

- (1) Noxious weeds are not increasing.
- (2) The number of perennial species is not diminished over time.
- (3) Plant vigor (production, seed and seedstalk production, cover, etc.) of remnant native or seeded (introduced) plants is maintained to enable reproduction and recruitment when favorable climatic or other environmental events occur.
- (4) Adequate organic matter (litter and standing dead plant material) is present for site protection and for decomposition to replenish soil nutrients relative to site potential.

STANDARD 7 (WATER QUALITY)

Surface and ground water on public lands fully support, or are making significant progress toward fully supporting, designated beneficial uses described in the Idaho Water Quality Standards (IDAPA 16.01.02)

STANDARD 8 (THREATENED AND ENDANGERED PLANTS AND ANIMALS)

Habitats are suitable to maintain viable populations of threatened and endangered, sensitive, and other special status species.



Proposed Idaho Guidelines for Livestock Grazing Management

INTRODUCTION

Guidelines direct the selection of Grazing Management Practices (GMPs) to ensure progress toward or attainment and maintenance of the standards. GMPs are livestock management techniques. They include the manipulation of season, duration (time), and intensity of use, as well as numbers, distribution, and kind of livestock. Livestock management facilities are structures such as fences, corrals, and water developments (ponds, springs, pipelines, troughs, etc.) used to facilitate the application of GMPs. Livestock grazing management practices and guidelines will be consistent with the Idaho Agricultural Pollution Abatement Plan.

GMPs and facilities are implemented locally on a pasture, allotment or watershed basis. GMPs will be developed through consultation, coordination, and cooperation with the BLM, permittee, other agencies, tribes, and interested publics.

These guidelines were prepared under the assumption that regulations and policies regarding grazing on public lands will be implemented and will be adhered to by the grazing permittees and agency personnel. If the regulations and policies are not followed, these guidelines will not be effective in achieving the desired rangeland health.

Anything not covered in these guidelines will be addressed by existing laws, regulations and policies.

GUIDELINES

1. The BLM will identify and document within the local watershed all impacts that affect the ability to meet the standards. If a standard is not being met due to livestock grazing, then allotment management will be adjusted unless it can be demonstrated that significant progress toward the standard is being achieved. This applies to all subsequent guidelines.
2. The use of GMPs will maintain or promote significant progress toward adequate amounts of ground cover (determined on an ecological site basis) to support infiltration, maintain soil moisture storage, and stabilize soils.
3. Livestock management facilities will be located away from riparian areas wherever they conflict with achieving or maintaining riparian-wetland function.
4. GMPs maintain or promote soil conditions that support water infiltration, plant vigor, permeability rates, and minimize soil compaction appropriate to site potential.
5. GMPs provide periodic rest during critical growth stages to allow sufficient regrowth to achieve and maintain healthy, properly functioning conditions, including good plant vigor and adequate vegetative cover, appropriate to site potential.
6. GMPs maintain or promote sufficient residual vegetation to improve, restore, or maintain healthy riparian-wetland functions and structure for energy dissipation, sediment capture, ground water recharge, streambank stability, and wildlife habitat appropriate to site potential.
7. The development of springs, seeps or other projects affecting water and associated resources shall be designed to protect the ecological functions, wildlife habitat, and significant cultural and historical/archaeological/paleontological values associated with the water source.

8. GMPs maintain, promote, or progress toward appropriate stream channel and streambank morphology and functions. Adverse impacts due to livestock grazing will be addressed.
9. GMPs maintain or promote the interaction of the hydrologic cycle, nutrient cycle, and energy flow that will support the appropriate types and amounts of soil organisms, plants, and animals appropriate to soil type, climate, and landform.
10. Apply GMPs to maintain adequate plant vigor for seed production, seed dispersal, and seedling survival of desired species relative to soil type, climate, and landform.
11. Maintain or improve water quality to meet Idaho Water Quality Standards.
12. Use GMPs developed in recovery plans, conservation agreements, Endangered Species Act, Section 7 consultations to maintain or improve habitat for Federally listed threatened, endangered, and sensitive plants and animals.
13. GMPs maintain or promote the physical and biological conditions necessary to sustain native plant populations and wildlife habitats in native plant communities.
14. On areas seeded predominantly with non-native plants, GMPs maintain or promote the physical and biological conditions to achieve healthy rangelands.
15. Native species are emphasized for rehabilitating disturbed rangelands. Evaluate whether native plants are adapted, available, and able to compete with weeds or seeded exotics.
16. Use non-native plant species for rehabilitation only in those situations where:
 - a. Native species are not readily available in sufficient quantities;
 - b. Native plant species cannot maintain or achieve the standards;Or,

- c. Where non-native plant species provide for management and protection of native rangelands.

Include a diversity of appropriate grasses, forbs, and shrubs in rehabilitation efforts.

17. On burned areas, allow natural regeneration when it is determined that populations of native perennial shrubs, grasses, and forbs are sufficient to revegetate the site. Rest burned or rehabilitated areas to allow recovery or establishment of perennial plant species.

18. Carefully consider the effects of new management facilities (e.g., water developments, fences) on healthy and properly functioning rangelands prior to implementation.

19. Use GMPs, where feasible, for wildfire control and to reduce the spread of target undesirable plants (e.g., cheatgrass, medusahead wildrye, and noxious weeds) while enhancing vigor and abundance of desirable native or seeded species.

20. Encourage permittees to participate in watershed advisory groups as they are formed throughout the state.

21. Employ GMPs that promote natural forest regeneration and protect reforestation projects until The Idaho Forest Practices Act (IDAPA 20.02.01.050) requirements for timber stand replacement are met.

22. Design management fences to minimize adverse impacts, such as habitat fragmentation, to maintain habitat integrity and connectivity for native plants and animals.

23. Non-native animal habitat may be considered when consistent with rangeland health.



Background on Standards and Guidelines

In August 1995, new grazing regulations for public lands managed by the Bureau of Land Management (BLM) went into effect (Part 43 Code of Federal Regulations 4, 1780, and 4100). These regulations require modifications of rangeland management practices to help preserve healthy rangelands and restore healthy conditions to those areas that are not functioning properly.

Under the new regulations, each state must implement *Standards for Rangeland Health and Guidelines for Grazing Administration*. States can either develop their own state or regional standards and guidelines or implement national “fallback” standards and guidelines outlined in the regulations.

BLM State Directors must develop state or regional standards and guidelines in consultation with Resource Advisory Councils, Indian tribes, other state and federal land management agencies responsible for the management of lands and resources within the region or area under consideration, and the public.

The standards and guidelines development process began in September 1995, shortly after Resource Advisory Councils were created through the new grazing regulations. After receiving training from the BLM in rangeland ecology, the 45 members of BLM Idaho’s three Resource Advisory Councils began the difficult task of developing standards and guidelines for Idaho. By March 1996, each Resource Advisory Council had developed a set of standards and guidelines. In June 1996, the BLM Idaho State

Director and BLM Idaho's three Resource Advisory Councils agreed to consolidate the three sets of standards and guidelines into one proposed set that would apply to all of the nearly 12 million acres of public land the BLM administers in Idaho.

State or regional standards and guidelines must be developed under the umbrella of the fundamentals of rangeland health established in the BLM's new grazing regulations. The fundamentals identify the basic physical and biological components needed to maintain healthy rangelands across the West as follows:

(A) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow.

(B) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities.

(C) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs.

(D) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species.

STANDARDS AND GUIDELINES provide specific measures of rangeland health and identify acceptable or best management practices to attain the fundamentals in keeping with the characteristics of a state or region, such as climate and landform.

STANDARDS are expressions of physical and biological condition or degree of function required for healthy, sustainable rangelands. They serve as the criteria to determine if management actions are resulting in the maintenance or attainment of healthy rangelands per the fundamentals of rangeland health. Standards apply to all rangeland in a state or region. The BLM's grazing regulations require state or regional standards to be consistent with the following guiding principles:

At a minimum, state or regional standards must address the following:

- (1) Watershed function;
- (2) Nutrient cycling and energy flow;
- (3) Water quality;
- (4) Habitat for endangered, threatened, proposed, Candidate 1 or 2, or special status species; and
- (5) Habitat quality for native plant and animal populations and communities.

GUIDELINES are the types of livestock grazing management methods and practices determined to be appropriate to ensure that standards can be met or that significant progress can be made toward meeting the standards. BLM managers have the flexibility to determine which guidelines are appropriate, and which are not, in a particular situation. Guidelines are tools for achieving the standards and will be applied as appropriate for each situation.

At a minimum, state or regional guidelines must address the following:

- (1) Maintaining or promoting adequate amounts of vegetative ground cover, including standing plant material and litter, to support infiltration, maintain soil moisture storage, and stabilize soils;
- (2) Maintaining or promoting subsurface soil conditions that support permeability rates appropriate to climate and soils;
- (3) Maintaining, improving or restoring riparian-wetland functions, including energy dissipation, sediment capture, groundwater recharge, and stream bank stability;
- (4) Maintaining or promoting stream channel morphology (e.g., gradient, width/depth ratio, channel roughness and sinuosity) and functions appropriate to climate and landform;
- (5) Maintaining or promoting the appropriate kinds and amounts of soil organisms, plants and animals to support the hydrologic cycle, nutrient cycle, and energy flow;
- (6) Promoting the opportunity for seedling establishment of appropriate plant species when climatic conditions and space allow;
- (7) Maintaining, restoring or enhancing water quality to meet management objectives, such as meeting wildlife needs;
- (8) Restoring, maintaining, or enhancing habitats to assist in the recovery of Federal threatened and endangered species;
- (9) Restoring, maintaining, or enhancing habitats of Federal Proposed Category 1 and 2 Federal candidate and other special status species to promote their conservation;

(10) Maintaining or promoting the physical and biological conditions to sustain native populations and communities;

(11) Emphasizing native species in the support of ecological function;

and

(12) Incorporating the use of non-native plant species only in those situations in which native species are not available in sufficient quantities or are incapable of maintaining or achieving properly functioning conditions and biological health.

The fundamentals of rangeland health and all standards and guidelines will be implemented in compliance with the National Environmental Policy Act (NEPA) of 1969 and applicable land use planning regulations. The fundamentals of rangeland health and the guiding principles for the development of state and regional standards and guidelines were analyzed in the Rangeland Reform '94 Final Environmental Impact Statement (FEIS). Any additional NEPA analysis required during development of state or regional standards and guidelines can tier to the analysis of the fundamentals of rangeland health and standards and guidelines presented in the Rangeland Reform '94 FEIS. BLM planning regulations direct that actions be in conformance with BLM land use plans. In some instances, standards and guidelines may be consistent with existing land use plans and implementation may proceed without further action. In other cases, land use plans may require amending.

The original deadline for states to either develop state or regional standards and guidelines or implement the fallbacks was February 12, 1997. However, in January 1997 all three of BLM Idaho's Resource Advisory Councils voted to request an extension of the deadline until August 12, 1997, in accordance with a rule published by the Department of the Interior in the fall of 1996. The Secretary of the Interior approved that request in February 1997.

State or regional standards and guidelines will be implemented after they are finalized and approved by the Secretary of the Interior. If, for some reason, it is not possible to complete the appropriate environmental review of proposed Idaho standards and guidelines and public involvement activities by August 12, the fallback standards and guidelines, which are described in Part 43 Code of Federal Regulations 4180.2(f)(1) and (2), will be put into effect until Idaho standards and guidelines are completed and approved by the Secretary of the Interior.

After the Secretary of the Interior approves *Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management*, the BLM Idaho State Director will implement them. The standards and guidelines will apply to all livestock grazing-related activities. The specific text of the stan-

dards and guidelines will be incorporated into existing land use plans through scheduled Annual Planning Updates or Rangeland Progress Summaries.

When they are implemented, the standards and guidelines will be used in the development of the grazing-related portions of all new activity plans (including Allotment Management Plans) and will form the basis of terms and conditions of new grazing permits and leases. The standards and guidelines will not be terms and conditions of these authorizations but will be reflected in them. For example, some indicators that might be used in determining the fulfillment of the standard relating to upland watershed function are plant and plant litter cover. In this case, cover levels to remain at the end of the grazing period might be part of the terms and conditions of a permit or lease.

The standards will also serve as the focus of all grazing-related assessment and monitoring activities that rely on site-specific criteria in determining if corrective action is necessary. As in the above example, individual site productivity potential serves as the basis for establishing the appropriate cover levels. Failure to comply with a standard in an isolated area would not necessarily result in corrective action.

Rangeland health assessment and monitoring, and any necessary corrective actions taken to fulfill a standard and comply with a guideline, will be undertaken in a priority order as determined by the BLM in consultation with permittees and interested publics.



Writing Effective Remarks

Individuals and organizations may send their impressions of the proposed Idaho standards and guidelines developed by the Resource Advisory Council and suggestions for improvement in writing through May 16, 1997. Written remarks should be sent to *J. David Brunner*, BLM Idaho State Office, 1387 S. Vinnell Way, Boise, Idaho, 83709. All written remarks must be postmarked no later than May 16.

To ensure that written remarks are as effective as possible, individuals and organizations should consider the following suggestions:

1. Comments should focus on what part(s) of the proposed standards and guidelines need to be changed and why they need to be changed. Please keep in mind that BLM is required by grazing regulations that went into effect in August 1995 to implement standards and guidelines that must attain the fundamentals of rangeland health, listed on page #14, and must be consistent with the guiding principles listed on page #15.

2. Comments should specifically identify the section of the document that they apply to. For example, it would be very effective to begin a comment, "Standard 7 (Water Quality). This standard needs to be changed to....because..." This will help BLM staff and Resource Advisory Council members quickly and accurately find the section the individual or organization is referring to.

3. Comments should be fairly specific. BLM staff and Resource Advisory Council members will review comment letters for the following details:

- Comments that identify problems with specific elements of proposals.
- Comments that cite errors in the information presented in the document.
- Comments that seek clarification of the information presented in the document.
- Comments that provide significant new information.
- Comments that provide substantive new alternatives to proposals presented in the document.

It is not always easy to understand government documents. Individuals and organizations who would like to discuss proposed Idaho standards and guidelines with one of the Resource Advisory Council members who developed them should contact the appropriate Resource Advisory Council Coordinator, listed on page #1. Individuals and organizations who would like to discuss proposed Idaho standards and guidelines with BLM staff should contact the nearest BLM office (see page #19).

BLM Idaho Offices

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UPPER COLUMBIA - SALMON CLEARWATER DISTRICTS

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SALMON FIELD OFFICE

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